

STATE OF OHIO)
)
CUYAHOGA COUNTY) ss AFFIDAVIT

NICHOLASA SANTARI, being duly sworn, deposes and says that

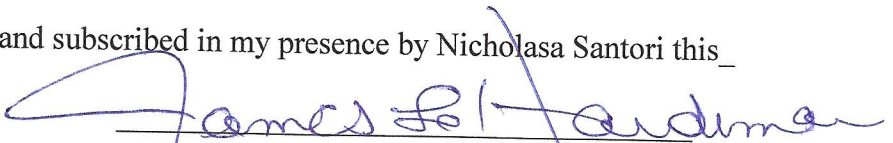
1. I am 45 years of age, I was born on January 19, 1973.
2. I am the mother of Shase Howse who was born on August 13, 1995.
3. On July 28, 2016 I resided at 747 East 102nd Street, Cleveland, Ohio with my son, Shase Howse.
4. My home on East 102nd Street is in the City's Glenville neighborhood located on the southeast side of the City of Cleveland.
5. On August 28, 2016 I had been riding my bicycle in the neighborhood and I received a telephone call on my cell phone from my son Shase who indicated that he might have forgotten his house key.
6. At the time that I received the telephone call I was on St. Clair around the corner from my house on East 102nd.
7. While we were still on the telephone he said that he had found his key and then I heard some commotion.
8. I could hear my son saying something to the effect that, "I live here, I live here. What the fuck?"
9. I detected that there was some commotion going on and I could hear my son grunting.
10. I became very concerned so I immediately rode back to my house which took me less than a minute.
11. When I arrived home, I saw three men in dark clothing on my porch and one man was straddling my son who was face down on the porch.
12. I could see that one of the men struck my son with a closed fist while he was face down which forced his head to strike the porch.
13. I asked what was going on and pleaded with them to stop beating.
14. I identified myself as his mother and continued to ask them to stop and told them that he lived there.

Exhibit 4

15. One of the men said that he was trying to break in and I said he has a key.
16. The scene was chaotic and Shase did not appear to be fighting with the men.
17. I realized that the men who were beating my son were police and I continually asked them to stop beating him since this was his house.
18. I believe that the police were using excessive force and that there was no need to punch him while he was lying on the porch floor.
19. They refused to release him and I witnessed them escort him to a police car while his wrist were in hand cuffs.
20. I continued to explain that he lived at this house but they would not listen to my explanation.
21. While Shase was in the police car he was extremely agitated and I tried to calm his down.
22. After he was arrested he was taken him to City Jail and his bond was \$1,000.00.
23. I was able to borrow money for his bond and, after I posted his bond he was released.
24. I learned that he had been criminally charged with assaulting the police which I do not believe occurred.
25. The facts and statements contained herein are true and accurate to the best of my knowledge and belief.


Nicholasa Santori

SWORN TO BEFORE ME and subscribed in my presence by Nicholasa Santori this_
18th day of December, 2018.





JAMES L. HARDIMAN
Attorney At Law
NOTARY PUBLIC
STATE OF OHIO
My Commission Has
No Expiration Date
Section 147.03 O.R.C.